

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel to the Official Committee of
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In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*¹,

Debtors.

Chapter 11

Case No: 22-14539-JKS

(Jointly Administered)

Re: Docket Nos. 529 and 618

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE
DEBTORS' OBJECTION TO THE MOTION OF TIMOTHY NESTER AND
CHRISTOPHER ECKMAN FOR AN ORDER GRANTING RELIEF FROM THE
AUTOMATIC STAY TO TERMINATE REAL ESTATE CONTRACT**

The Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the above-captioned jointly administered chapter 11 cases (the “**Chapter 11 Cases**”) of National Realty Investment Advisors, LLC, *et al.* (the “**Debtors**”), by and through its undersigned counsel, hereby joins in the objection (the “**Objection**”) [Dkt. No. 618] of the Debtors to the *Motion of*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

Timothy Nester and Christopher Eckman for an Order Granting Relief from the Automatic Stay to Terminate Real Estate Contract [Dkt. No. 529] (the “**Motion**”) and respectfully states as follows:

JOINDER

1. The Committee has reviewed the Objection and shares in the concerns and objections raised by the Debtors to the Motion.

2. The Committee respectfully joins in the substantive arguments raised in the Objection and adopts and incorporates such arguments as if more fully set forth herein.

3. Ultimately, the Movants should not be permitted to terminate the Contract (as defined in the Objection), nor should relief from the automatic stay be granted as that would condone the Movants’ refusal to proceed with the purchase because of the Debtors’ bankruptcy filing to the detriment of the estate and its creditors.

4. The Committee respectfully reserves the right to raise and present additional authorities, arguments, evidence and objections in connection with the matters addressed in the foregoing pleadings or that may arise in a future hearing. In the event that the Objection is withdrawn or otherwise resolved, the Committee further reserves the right to present argument on the Motion.

CONCLUSION

WHEREFORE, the Committee respectfully requests that the Court deny the Motion and grant such other and further relief as the Court deems just and proper.

[See signature on next page]

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS

Dated: September 23, 2022

/s/ Louis T. DeLucia

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